

REMARKS/ARGUMENTS

This Amendment is being filed in response to the Office Action dated March 8, 2011. Reconsideration and allowance of the application in view of the amendments made above and the remarks to follow are respectfully requested.

Claims 17-32 are pending in the Application. Claims 17, 20, and 25 are independent claims.

In view of rejections discussed below, the Applicants have elected to amend the claims to simplify their recitations. Specifically, the term "stored media content" is replaced with "internal media content" so as to clarify that two types of media content are set out. The internal media content, that is internal to the optical disk, i.e., residing on the optical disk, and the external media content, that is external to the optical disk, i.e., residing on the computing devices distributed on a network. Additionally, the term "added private key" was replaced with "first private key" to indicate that the private key in question is simply a private key of the external media content. Finally, the outputting of the associated internal and external media content is now recited as a separate element from the control system.

For example, claim 20, for example, now sets out

- "read-out internal media content and a public key, both provided on a same optical disk"
- "download one or more external media content,
 - each external media content having a private key and
 - is provided on one or more computing devices distributed on a network"
- "verify the authenticity of the downloaded external media content using the public key read-out from the optical disk"

- "output the internal media content in coordination with the associated downloaded external media content".

In the Office Action, claims 17-32 are rejected under 35 U.S.C. §112, first and second paragraphs. This rejection of claims 17-32 is respectfully traversed. However, in the interest of expediting consideration and allowance of the pending claims, the Applicants have elected to amend the claims to address the concerns raised in the Office Action and in accordance with the discussion provided by the Examiner. Accordingly, it is respectfully submitted that the rejected claims are in proper form and it is respectfully requested that these rejections be withdrawn.

In the Office Action, claims 24 and 31 are objected to. In the interest of advancing consideration and allowance of the claims, the Applicants have elected to amend claims 24 and 31 to address the concerns raised in the Office Action. Accordingly, withdrawal of the objection to claims 24 and 31 is respectfully requested.

In the Office Action, claims 17, 18, 20, 22, 24, 25, 27-29, 31 and 32 are rejected under 35 U.S.C. §103(a) over U.S. Patent No. Publication No. 2004/0001697 to Kumbayashi ("Kumbayashi") in view of U.S. Patent No. 6,470,085 to Uranaka ("Uranaka"). Claim 19 is rejected under 35 U.S.C. §103(a) over Kumbayashi in view of Uranaka and further in view of U.S. Patent No. 5,754,648 to Ryan ("Ryan"). Claims 21 and 26 are rejected under 35 U.S.C. §103(a) over Kumbayashi in view of Uranaka and further in view of U.S. Patent Publication No. 2002/0073316 to Collins ("Collins"). Claims 23 and 30 are rejected under 35 U.S.C. §103(a) over Kumbayashi in view of Uranaka and further in view of U.S. Patent Publication No. 2004/0126095 to Tsumagari ("Tsumagari"). These

rejections of the claims are respectfully traversed. It is respectfully submitted that claims 17-32 are allowable over Kumbayashi in view of Uranaka alone and in view of Ryan, Collins, and Tsumagari for at least the following reasons.

With regard to Kumbayashi, the only paragraphs [0216] and [0239] referring to a public key disclose: "The parser/interpreter 35 prestores a public key", thus, it is respectfully submitted that Kumbayashi fails to teach, disclose, or suggest "an optical disk driver unit to read-out internal media content and a public key, both provided on a same optical disk, the public key is for authenticating external media content associated with the internal media content", as recited in claim 20, for example. Further, Kumbayashi does not teach, disclose, or suggest "an output portion to output the internal media content in coordination with the associated downloaded authenticated external media content".

At page 11, the Office Action admits that Kumbayashi fails to disclose that the public key is read from the optical disk, and relies on Uranaka for disclosing that which is admitted missing from Kumbayashi. However it is respectfully submitted that this reliance on Uranaka is misplaced.

In relevant part, at Col. 6, lines 42-54, Uranaka describes "a DVD driver 130 for reading out the data recorded on the DVD 3 and for demodulating and error-correcting the read data ..." At Col. 7, lines 9-33 Uranaka describes reading and executing the volume control program 24 that prompts the user to select a desired one of the applications. At Col. 8, lines 23-41 Uranaka describes "associating the sever public key (PK_s) contained in the distribution descriptor 23 recorded in the burst cutting area of the DVD with the ID and the network address". Finally, at col. 12, lines 12-15 Uranaka describes encrypting with a

server public key read from the distribution descriptor 23 recorded in the burst cutting area of the DVD. Accordingly, "the sever public key (PK_s) contained in the distribution descriptor 23" of Uranaka is used for encrypting NOT for "authenticating external media content", as recited in the claims of the present application. Thus, Uranaka also fails to teach, disclose, or suggest "an optical disk driver unit to read-out internal media content and a public key, both provided on a same optical disk, the public key is for authenticating external media content associated with the internal media content" or "an output portion to output the internal media content in coordination with the associated downloaded authenticated external media content", as recited in claim 20, for example.

It is respectfully submitted that the claims are not anticipated or made obvious by the teachings of the presented references. For example, Kumbayashi in view of Uranaka do not teach, disclose or suggest, (illustrative emphasis added) "an optical disk driver unit to read-out internal media content and a public key, both provided on a same optical disk, the public key is for authenticating external media content associated with the internal media content; a network interface to download one or more external media content, each external media content having a private key and is provided on one or more computing devices distributed on a network; a control system to verify the authenticity of the downloaded external media content using the public key read-out from the optical disk; and an output portion to output the internal media content in coordination with the associated downloaded authenticated external media content, wherein the authenticity of the external media content is verified independent of the authenticity of the one or more computing devices on which the external media content is provided", as recited in claim 20 and as

similarly recited in each of claims 17 and 25.

Ryan, Collins, and Tsumagari are introduced for allegedly showing elements of the dependent claims and as such, do not cure the deficiencies in Kumbayashi in view of Uranaka.

Based on the foregoing, the Applicants respectfully submit that the independent claims are patentable over Uranaka in view of Tsumagari and notice to this effect is earnestly solicited. The dependent claims respectively depend from one of the independent claims and, accordingly, are allowable for at least this reason as well as for the separately patentable elements contained in each of the claims. Accordingly, separate consideration of each of the dependent claims is respectfully requested.

In addition, Applicants deny any statement, position or averment of the Examiner that is not specifically addressed by the foregoing argument and response. Any rejections and/or points of argument not addressed would appear to be moot in view of the presented remarks. However, the Applicants reserve the right to submit further arguments in support of the above stated position, should that become necessary. No arguments are waived and none of the Examiner's statements are conceded.

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Amendment in Reply to Office Action of March 8, 2011

Applicants have made a diligent and sincere effort to place this application in condition for immediate allowance and notice to this effect is earnestly solicited.

Respectfully submitted,

By Gregory L. Thorne

Gregory L. Thorne, Reg. 39,398
Attorney for Applicants
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THORNE & HALAJIAN, LLP

111 West Main Street
Bay Shore, NY 11706
Tel: (631) 665-5139
Fax: (631) 665-5101

Please direct all inquiries and correspondence to:

Michael E. Belk, Reg. 33,357
Philips Intellectual Property & Standards
P.O. Box 3001
Briarcliff Manor, NY 10510-8001
(914) 333-9643